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March 10, 2023

BY ECF

Hon. Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Re: *United States of America and States of the United States, ex rel.
Donohue v. Richard Carranza, et al., 1:20-CV-5396 (GHW)*

Dear Judge Woods:

This firm represents defendants the Board of Education of the City of Chicago and its former Superintendent, Jose M. Torres, PhD (collectively, “Chicago BOE”) in the above-referenced case.

Yesterday, we filed on behalf of defendants New York City Department of Education and its former Chancellors, Richard Carranza and Meisha Porter, a letter requesting an extension of time to file a motion for attorneys’ fees, which the Court may award to prevailing defendants in accordance with 31 U.S.C. § 3730(d)(4) (ECF No. 260). The purpose of this letter is to respectfully request the same 30-day extension of time, to April 13, 2013, for Chicago BOE to file such a motion so that Chicago BOE can properly evaluate the relevant legal standards and their applicability to the claims in this case. Per Federal Rule of Civil Procedure 54(d)(2)(B)(i), the motion is currently due on March, 14, 2023. This is the first request for an extension of time to file this motion on behalf of Chicago BOE. Counsel for Plaintiff-Relator has informed us that Plaintiff-Relator does not object to this request.

Respectfully,

/s/ Joseph V. Willey
Joseph V. Willey

Cc: All counsel of record, via ECF